

EXHIBIT A

Page 1

1 UNITED STATES DISTRICT COURT
2 FOR THE EASTERN DISTRICT OF PENNSYLVANIA3 BOARHEAD FARM AGREEMENT CIVIL ACTION NO.
4 GROUP, 02-CV-3830

5 Plaintiff,

6 Judge Legrome D. Davis

7 vs. Oral Deposition of

8 KAREN CASTILLO

9 ADVANCED ENVIRONMENTAL TECHNOLOGY
10 CORPORATION; ASHLAND CHEMICAL
11 COMPANY; BOARHEAD CORPORATION;
12 CARPENTER TECHNOLOGY CORPORATION;
13 CROWN METRO, INC.; DIAZ CHEMICAL
14 CORPORATION; EMHART INDUSTRIES,
15 INC.; ETCHED CIRCUITS, INC.; FCG,
16 INC.; GLOBE DISPOSAL COMPANY, INC.;
17 GLOBE-WASTECH, INC.; HANDY & HARMAN
18 TUBE COMPANY, INC.; KNOLL, INC.;
19 MERIT METAL PRODUCTS CORPORATION;
20 NOVARTIS CORPORATION; NRM INVESTMENT
21 COMPANY; PLYMOUTH TUBE COMPANY;
22 QUIKLINE DESIGN AND MANUFACTURING
23 COMPANY; RAHNS SPECIALTY METALS,
24 INC.; ROHM & HAAS COMPANY, SIMON
25 WRECKING COMPANY, INC.; TECHALLOY
 COMPANY, INC.; THOMAS & BETTS
 CORPORATION; UNISYS CORPORATION;
 UNITED STATES OF AMERICA
 DEPARTMENT OF NAVY,

Defendants.

17 * * * * *

18 TUESDAY, JUNE 3, 2003

19 * * * * *

20 Transcript in the above matter taken at
21 the offices of Ballard, Spahr, Andrews & Ingersoll,
22 LLP, 1735 Market Street, 42nd Floor, Philadelphia,
23 Pennsylvania, commencing at 10:00 A.M.

24 Certified Shorthand Reporting Services

25 Arranged Through

Mastroianni & Formaroli, Inc.

709 White Horse Pike

Audubon, New Jersey 08106

(856) 546-1100

Karen Castillo

Page 18

1 Q. By that you mean the Boarhead Farm site?

2 A. Yes.

3 Q. Let's stay back with your office at
4 Echo.

5 Did the name DeRewel Chemical Company
6 come about while you were still sitting at the Echo
7 facility or was that later?

8 MS. FLAX: Objection.

9 A. I believe it was later.

10 Q. So at some point in time you moved the
11 operation to the Boarhead site?

12 A. Yes.

13 Q. Can you tell me when that was?

14 A. What year it was?

15 Q. If you can.

16 A. No. I can't.

17 Q. All right.

18 A. I honestly can't.

19 Q. That's fine.

20 Tell us about the move to Boarhead.

21 Where did the office get set up at the Boarhead site?

22 A. We refer to the one building as a
23 chicken coop and the office was in the first room of
24 the chicken coop.

25 Q. Could you describe the office? And by

Page 53

1 A. I would say yes.

2 Q. I want you to take a look at not the
3 next one down, it's hard to read, but the one after
4 that. It's the second to last page in this exhibit
5 and it's kind of upside down but the number upside
6 down is 35429.

7 A. Yes.

8 Q. It's an invoice says DeRewel Chemical
9 Company at the top?

10 A. Yes.

11 Q. Do you recognize this form? I don't
12 mean this particular one, but the form itself.

13 A. Yes.

14 Q. What was the uses for this form while
15 you were working at the Boarhead site?

16 A. Billing customers.

17 Q. Whose job was it to prepare invoices
18 like the one we are looking at here?

19 A. I did.

20 Q. What did you use to get the information
21 that appears on -- appeared on an invoice like this
22 one that we are looking at?

23 A. Somebody would have told me or given me
24 a piece of paper to type it up.

25 Q. Was it the business of DeRewel Chemical

14 (Pages 50 to 53)

Karen Castillo

Page 54

1 Company at the time you prepared invoices like the
2 one we are looking at to maintain the invoices as
3 part of the records of the company?

4 A. Yes.

5 Q. Having taken a look at this invoice,
6 this 35429, do you have any recollection of receiving
7 from any DeRewel -- any other DeRewel employees any
8 type of shipping documents or other kinds of
9 information that would have reflected pickups of
10 waste from customers?

11 A. From other employees? They could have
12 given me a piece of paper or my brother could have
13 done it or Fred could have done it. Come in and tell
14 me that they just picked up, you know, umpteen
15 barrels from umpteen company and I would bill them.

16 Q. Let me try the question a slightly
17 different way.

18 Was there any form that we haven't seen
19 yet --

20 A. Oh, no.

21 Q. -- that you recall DeRewel Chemical
22 having that reflected what the business, what was
23 picked up where and when --

24 A. No.

25 Q. -- that you recall?

Karen Castillo

June 3, 2003

Page 64

1 you came back to live on Boarhead Farm.

2 A. Oh, divorce, I came back to Pennsylvania
3 from Fort Lauderdale to help my son through a divorce
4 and help him watch his kids. Meanwhile, we are
5 renting space here on this farm currently until my
6 son gets himself another house.

7 Q. Who are you renting the space from?

8 A. Fred DeRewel.

9 Q. Do you do any work for Mr. DeRewel,
10 Senior at the farm currently?

11 A. No.

12 Q. If you could please bear with me and
13 take a look at P-40.

14 A. Yes.

15 Q. You testified earlier that those
16 initials down on the bottom, KJB, indicate that you
17 typed this letter and I want to note the date of this
18 letter is March 2nd, 1973.

19 A. Correct.

20 Q. Now, from either that date, March '73 or
21 when you ceased working for Mr. DeRewel and went to
22 work at the restaurant full time until January of
23 this year have you ever been back to Boarhead Farm?

24 A. To visit, yes.

25 Q. How many times?

Karen Castillo

Page 66

1 since you left to work for the Golden Pheasant in or
2 about 1973?

3 A. No.

4 Q. At some point in time your name changed
5 from Karen Bean to Karen Castillo, correct?

6 A. Yes.

7 Q. Is that because you got married?

8 A. Yes.

9 Q. What year did you get married?

10 A. '78.

11 Q. Now, I want to focus on during the time
12 when you worked for Mr. DeRewel, Senior at the
13 Boarhead Farm site. Okay?

14 A. Yes.

15 Q. Did you ever see anyone or are you aware
16 of anyone else, aside from yourself, who prepared
17 invoices that went to customers of DeRewel Chemical
18 Company?

19 A. No.

20 Q. Are you familiar with a woman by the
21 name of Lillian Gronkowski (ph.)?

22 A. Eileen. Eileen Garonski (ph.)

23 Q. Eileen Garonski (ph.) Tell me --

24 A. You were close. I know her, but that's
25 all. I know her.

Karen Castillo

June 3, 2003

Page 76

1 Q. Do you know who provided you this
2 information?

3 A. No.

4 Q. Was there a price list for what was
5 charged to customers?

6 A. No.

7 Q. How did you know how much to charge a
8 customer say, for example, disposing of a 55-gallon
9 drum?

10 A. I would get that info from Fred, Senior.

11 Q. So Mr. DeRewel, Senior would provide you
12 with the cost per 55-gallon drum to charge a
13 particular customer; is that correct?

14 A. Yes, or it was in black and white as a
15 quote.

16 Q. And do you know who prepared any such
17 quotes?

18 A. Fred, Senior.

19 Q. Do you know what the cost of disposing a
20 full 55-gallon drum was during the time of your
21 employment with any DeRewel company?

22 A. No.

23 Q. Do you know what the cost of disposal of
24 a full 30-gallon drum would cost, was for any --
25 while you worked for any DeRewel company?